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December 8, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Docket numbers 01-338 and 04-313

Dear Ms. Dortch:

On Tuesday, December 7, 2004 Susan Davis and Praveen Goyal, Covad Communications Company, met with Jessica Rosenworcel regarding the above-referenced dockets. During the meeting, Covad discussed the need for the Commission to refrain from imposing EELs eligibility criteria on UNE high-capacity loops. Covad also discussed the need to adopt impairment triggers for UNE transport that faithfully reflected the potential revenue opportunities sufficient to generate competitive self-provisioning and wholesaling of alternative transport facilities. Covad discussed the need to develop impairment triggers for UNE DS-1 loops based on the level of competitive entry for DS-1 facilities to specific customer locations, rather than simply competitive entry by any supplier of alternative facilities in any part of a building. Finally, Covad discussed the ability of the Commission to lawfully reinstate the line sharing UNE. The substance of Covad's presentation was consistent with its prior filings, and no additional materials were presented during the meeting.

Respectfully submitted,

/s/ Praveen Goyal
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